

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

Plaintiff, :

-and- :

THE VULCAN SOCIETY, INC., *for itself and* :
on behalf of its members, JAMEL :
NICHOLSON, and RUSEBELL WILSON, :
individually and on behalf of a subclass of all :
other victims similarly situated seeking :
classwide injunctive relief, :

ROGER GREGG, MARCUS HAYWOOD, and :
KEVIN WALKER, *individually and on behalf* :
of a subclass of all other non-hire victims :
similarly situated; and :

CANDIDO NUÑEZ and KEVIN SIMPKINS, :
individually and on behalf of a subclass of all :
other delayed-hire victims similarly situated, :

Plaintiff-Intervenors, :

-against- :

THE CITY OF NEW YORK, :

Defendant. :

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**SPECIAL MASTERS' FIRST
STATEMENT OF FEES & EXPENSES**

07-cv-2067 (NGG) (RLM)

Steven M. Cohen, Hector Gonzalez, Mitra Hormozi and Breon S. Peace, Special Masters.

The Special Masters respectfully submit this First Statement of Fees & Expenses pursuant to the Court's May 22, 2012 Memorandum and Order Confirming Appointment of Special Masters (the "Appointment Order") (Docket Entry #883) and in accordance with the fee structure set forth in the Court's March 8, 2012 Memorandum & Order (the "March 8 Order")

(Docket Entry # 825 (referring to rates set for Court Monitor in the December 9, 2011 Order (Docket Entry # 768) at 3-4)). The Appointment Order directs the Special Masters to submit itemized statements of fees and expenses every 60 days.

Enclosed as Exhibits A through D are itemized statements of fees and expenses for each of the Special Masters and their law firms. The Special Masters and their law firms have agreed to provide services at the rates referred to in the March 8 Order. As set forth in greater detail in Exhibits A through D, the tasks completed during the period February 27, 2012 through May 31, 2012¹ included, among others: (i) review of filings and orders in the matter; (ii) preparation of the Report and Recommendations submitted on April 10, 2012; and (iii) preparation for the meet and confer with the parties to this litigation.

The Special Masters respectfully request that the Court approve these fees and expenses.

Dated: July 9, 2012
New York, New York

Respectfully submitted,

/s/ Hector Gonzalez
Hector Gonzalez, Special Master
Dechert LLP
1095 Avenue of the Americas
New York, New York 10036
Telephone: (212) 698-3500
Facsimile: (212) 314 0058

Steven M. Cohen, Special Master
ZUCKERMAN SPAEDER LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone:(646) 746 8661
Facsimile: (212) 704-4256

¹ The Special Masters note that this initial application covers a period greater than 60 days. This application is being submitted within 60 days of the formal appointment of the Special Masters. Going forward, the Special Masters will submit statements of fees and expenses in accordance with the Court's directive.

Mitra Hormozi, Special Master
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-6460

Breon S. Peace, Special Master
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999